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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Wayne Mayes, as Guardian for Harry
Michael Reid; and, Lucille Lagasse,

Plaintiff,

v.

The United States of America; DOE
Individuals I-X; and, ROE Entities I-X,
inclusive,

Defendants.

Case No. 2:21-cv-00296-APG-BNW

**Stipulation and Order to Extend Time
for the United States to Respond to
Plaintiff Harry Michael Reid's Motion
to Amend Claim for Damages Pursuant
to 28 U.S.C. § 2675(b) (ECF No. 66)**

(First Request)

Plaintiffs Lucille Lagasse, as Guardian for Harry Michael Reid, and Lucille Lagasse
("Plaintiffs") and Defendant, the United States of America ("United States"), by and
through the undersigned counsel, hereby stipulate and request that the deadline for the
United States to respond to Plaintiff Harry Michael Reid's Motion to Amend Claim for
Damages Pursuant to 28 U.S.C. § 2675(b) (EFC No. 66) be extended five (5) calendar days
from May 23, 2024 to May 28, 2024. Plaintiffs' reply would thus be due on June 4, 2024.

The Parties have recently sought out information related to the prospect of private
mediation in this matter. As part of the evaluative process, undersigned counsel for the

United States was required to expend significant time determining her office's internal and external budgetary resources for the mediation and expended significant efforts to attempt to determine whether the requisite levels of settlement authority, both within her office and her agency, could be available prior to undertaking any such mediation. These efforts, while valuable, detracted from time that the United States otherwise would have used to respond to Plaintiffs' motion. As a result, this request is made in good faith and not for purposes of delay.

Respectfully submitted this 23rd day of May, 2024.

CLOSE LAW GROUP

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/s/ Jason A. Close

/s/ Summer A. Johnson

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ORDER

IT IS SO ORDERED:


HONORABLE BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

DATED: May 24, 2024